

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. André M. Espinosa  
: :  
v. : Mag. No. 25-11131  
: :  
RAS BARAKA : CRIMINAL COMPLAINT  
: :

I, Ricky J. Patel, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent in Charge with the United States Department of Homeland Security – Homeland Security Investigations, and that this complaint is based on the following facts:

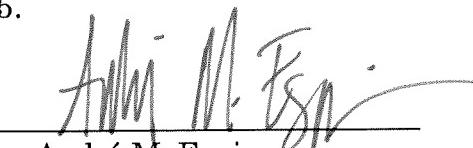
**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

s/ Ricky J. Patel

Ricky J. Patel  
Special Agent in Charge  
U.S. Department of Homeland  
Security, Homeland Security  
Investigations

Special Agent in Charge Patel attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on this 9th day of May, 2025.

  
\_\_\_\_\_  
Hon. André M. Espinosa  
United States Magistrate Judge

**ATTACHMENT A**

**(Trespassing)**

On or about May 9, 2025, in Essex County, in the District of New Jersey, within or upon land reserved and acquired for the use of the United States, and under the jurisdiction of the United States, the defendant,

**RAS BARAKA,**

did, knowing that he was not licensed or privileged to do so, enter and remain in a place as to which notice against trespass was given.

In violation of Title 18, United States Code, Section 13 and N.J.S.A. 2C:18-3.

**ATTACHMENT B**

I, Ricky J. Patel, am the Special Agent in Charge of the Newark Division of the Department of Homeland Security, Homeland Security Investigations (“HSI”). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including statements made or reported by various witnesses with knowledge of relevant facts and my review of evidence. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about May 9, 2025, Ras Baraka, arrived at the Delaney Hall Facility in Newark, New Jersey.

2. The Delaney Hall Facility currently operates as a federal immigration facility pursuant to a contract between the GEO Group, Inc., the entity that owns the Delaney Hall Facility, and U.S. Immigration and Customs Enforcement (“ICE”). As a result of this contract, the Delaney Hall Facility has been acquired for the use of the United States and is under the jurisdiction of the United States.

3. The Delaney Hall Facility is surrounded by chain-link fences and is accessible only through granted access. In addition to maintaining security, it likewise displays No Trespassing signage.

4. On or about May 9, 2025, notwithstanding the above, Ras Baraka, unlawfully entered and remained in the Delaney Hall Facility.